

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

APRIL KISER,

Plaintiff,

v.

J AND R TRANSPORTATION, INC.,

Defendant.

CASE NO. 2:22-cv-12185

JUDGE F. KAY BEHM

J AND R TRANSPORTATION
MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO MOTION IN LIMINE

* * * * *

Now comes Defendant J and R Transportation, Inc. ("J and R"), by and through counsel, and respectfully requests an Order from the Court granting it an extension of time to February 5, 2024 to respond to Plaintiff's Motion in Limine. The grounds in support of this Motion are set forth in the accompanying memorandum.

Respectfully submitted,

/s/ Philip D. Goldsmith
LENNARD GRAHAM & GOLDSMITH, PLC
PHILIP D. GOLDSMITH (P37650)
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MEMORANDUM IN SUPPORT

Plaintiff filed her Complaint in this matter claiming that she has not been fully paid for services rendered during an alleged term of employment. Plaintiff asserts claims under the FSLA and Michigan's WOVA.

Plaintiff filed a Motion in Limine on January 11, 2024. Under the local rules, J and R's response is due January 25, 2024. J and R seeks an Order from the Court granting it an extension of time to February 5, 2024 to respond to the Motion. Additional time is needed to fully review and properly respond to the arguments presented. Counsel for Plaintiff has been notified by e-mail that this request was going to be presented. J and R does not believe that Plaintiff will sustain prejudice if the Court grants its request for extension. The trial date is currently set for April 23, 2024 so the requested extension will not impact the trial date.

WHEREFORE, Defendant J and R Transportation, Inc. respectfully requests an Order from the Court granting it an extension of time to February 5, 2024 to respond to Plaintiff's Motion in Limine.

Respectfully submitted,

Dated: January 24, 2024

/s/ Philip D. Goldsmith
Philip D. Goldsmith (P37650)
Attorney for Defendant

PROOF OF SERVICE

The undersigned certifies that he caused a copy of Defendant's Motion for Extension has been served upon Josh Sanford, Esq., Sanford Law Firm, Kirkpatrick Plaza, 10800 Financial Centre Parkway, Suite 510, Little Rock, Arkansas 72211 by sending same by e-mail ONLY to josh@sanfordlawfirm.com, on January 24, 2024.

/s/ Phil D. Goldsmith
Phillip D. Goldsmith, Esq. (P-37650)
Attorney for Defendant